

1 AARON D. FORD
2 Attorney General
3 ROST C. OLSEN, Bar No. 14410
4 Deputy Attorney General
5 State of Nevada
6 Public Safety Division
7 100 N. Carson Street
8 Carson City, NV 89701-4717
9 Tel: (775) 684-1209
10 E-mail: rolsen@ag.nv.gov

11 *Attorneys for Defendants Richard C.
12 Adams, Mark Boyd, William Gittere,
13 and Evelyn Rodriguez*

14 JAQUAN BARNES,

15 Plaintiff,

16 vs.

17 WILLIAM GETTIERR, et al.,

18 Defendant.

19 Case No. 3:18-cv-00390-MMD-CLB

20 **MOTION TO EXTEND DISPOSITIVE
21 MOTIONS DEADLINE (First Request)**

22 Defendants, Richard C. Adams, Mark Boyd, William Gittere, and Evelyn
23 Rodriguez, by and through counsel, Aaron D. Ford, Attorney General of the State of
24 Nevada, and Rost C. Olsen, Deputy Attorney General, move this Court for a 90-day
25 extension of the dispositive motions deadline.

26 **MEMORANDUM OF POINTS AND AUTHORITIES**

27 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
28 follows:

29 When an act may or must be done within a specified time, the
30 court may, for good cause, extend the time: (A) with or without
31 motion or notice if the court acts, or if a request is made, before
32 the original time or its extension expires; or (B) on motion made
33 after the time has expired if the party failed to act because of
34 excusable neglect.

35 / / /

Here, Defendants respectfully request a 90-day extension to the dispositive motions deadline contained in the scheduling order in this matter, currently set for May 6, 2020. (ECF No. 21 at 3:24-26). The Court entered the scheduling order prior to staying this matter for 90 days as to Defendant Adams pursuant to the American Service-Members Protection Act. (ECF No. 27 at 2).

Defendants submit this extension will allow for the efficient adjudication of this matter, and will preclude all parties from unnecessarily duplicating their efforts in preparing multiple motions, oppositions, etc. Furthermore, such an extension will promote judicial economy in this matter, in that the Defendants will be able to present all substantive issues in this matter to the Court in one motion for summary judgment, thus allowing the Court to come to a comprehensive summary judgment decision in one order.

Additionally, should Plaintiff seek to reopen discovery as to all Defendants, or if the Court is inclined to do so *sua sponte* in light of this request, Defendants would not oppose such.

Accordingly, for the foregoing reasons, Defendants request this Court extend the dispositive motions deadline currently set in this matter for May 6, 2020 for 90 days until **August 4, 2020**.

DATED this 5th day of May, 2020.

AARON D. FORD
Attorney General

By: /s/ Rost C. Olsen
ROST C. OLSEN, Bar No. 14410
Deputy Attorney General

Attorneys for Defendants

IT IS SO ORDERED.

Dated: May 6, 2020.

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada and that on this 5th day of May, 2020, I caused a copy of the foregoing, **MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE (First Request)**, to be served, by U.S. District Court CM/ECF Electronic Filing on the following:

JaQuan Barnes, #1175886
Care of ESP Law Librarian
P.O. Box 1989
Ely, NV 89301
ESP_LawLibrary@doc.nv.gov

Connor Sain
An employee of the
Office of the Attorney General